

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

THOMAS LYNCH and ROSEMARY  
NELSON,

Plaintiff,

v.

EXPERIAN INFORMATION  
SOLUTIONS, INC.,

Defendant.

Case No.: 0:20-cv-02535-JRT-JFD

**PLAINTIFFS' REQUEST TO  
WITHDRAW EXHIBITS**

Plaintiffs Thomas Lynch and Rosemary Nelson (“Plaintiffs”), by counsel respectfully submit this Request to Withdraw Exhibits 7 and 8 (Docs. 29 and 29-1 respectively) submitted with their Motion to Compel Discovery (“Motion”) against Defendant Experian Information Solutions, Inc. (“Defendant” or “Experian”).

Plaintiffs inadvertently included the foregoing Exhibits to the Motion to Compel, which Defendant designated as “confidential” in *Virgil Campbell v. Experian Information Solutions, Inc, et al.* Case No. 0:20-cv-02498-DSD-BRT. Further to Experian’s request, Plaintiff is withdrawing the Exhibits for the time being, but intends to challenge the confidentiality designation in *Campbell*. Plaintiff requested the production of similar documents that are applicable to this case, but Defendant has not produced these documents in this matter,<sup>1</sup> despite producing these documents in *Campbell* following

---

<sup>1</sup> While Plaintiff believes these documents were requested in its first set of discovery responses, Plaintiff sent a supplemental Request for Production on August 24, 2021. It is unclear at this time whether Defendant will produce the requested documents.

meet and confer efforts.<sup>2</sup> Plaintiff must now apparently meet and confer about the same requests/objections, even though the parties routinely have identical, redundant and unnecessary meet and confers about the **same** types of materials and objections in factually similar matters. Defendant also refuses to stipulate to use of these exhibits under seal here, thereby creating additional unnecessary motion practice in this case and *Campbell*.

RESPECTFULLY SUBMITTED this 30th day of August 2021,

By: /s/Jenna Dakroub  
Jenna Dakroub  
Bar Number: 0401650  
*Attorney for Plaintiffs, Thomas Lynch and  
Rosemary Nelson*  
**PRICE LAW GROUP, APC**  
8245 N. 85th Way  
Scottsdale, AZ 85258  
Telephone: (818) 600-5513  
Email: jenna@pricelawgroup.com

///

---

<sup>2</sup> Defendant routinely makes inconsistent production of documents, and objections to certain requests. Defendant also over designates materials as confidential.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2021, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notice of such filing to all attorneys of record in this matter.

/s/ Brianna Frohman